REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

Disposition of Claims

Claims 1-4 and 6-24 are pending in the application. Claims 1, 15, 17, 18, and 21-24 are independent. The remaining claims depend, directly or indirectly, from claims 1 and 18.

Claim Amendments

The independent claims have been amended to clarify the invention. Specifically, the independent claims have been amended to clarify that the variable usage specification (VUS) includes a usage specifying an attribute of an object in the object graph, where the object graph *has been previously created*. Said another way, the object graph exists prior to the creation of the transient object graph using the VUS. Support for this amendment may be found, for example, in paragraphs [0025] and [0033]-[0035] of the instant specification. No new matter has been added by any of the aforementioned amendments.

Rejection under 35 U.S.C. §102

Claims 1-4, 6-8, 12, 15-20, and 21-24 stand rejected under 35 U.S.C. § 102 as being anticipated by U.S. Patent No. 5,925,100 ("Acker"). To the extent that this rejection still applies to the amended claims, the rejection is respectfully traversed.

For anticipation under 35 U.S.C. § 102, the reference must teach every aspect of the claimed invention either explicitly or impliedly. The Applicant respectfully asserts that Acker does not disclose every aspect of the claimed invention.

Acker is directed to the *creation* of an object graph from an interface definition. As disclosed in Acker, initially an interface definition is obtained. Once the interface definition is obtained it is used to generate an abstract syntax tree. An object graph is subsequently created from the abstract syntax tree. Acker further discloses that each node in the object graph is an instance of an entry class and that each entry class corresponds to one "syntactic unit" of the interface definition. (*See* Acker, col. 5, ll. 45-64, col. 7, ll. 14-23, and Figures 3 and 4). Acker provides the following definition for a "syntactic unit" – "Each node of the abstract syntax graph is a struct which represents a syntactic unit of the interface definition, e.g., a method declaration, a parameter, an attribute declaration." (*See* Acker, col. 6, ll. 39-40).

Turning to the rejection, the Examiner has asserted that the interface definition is equivalent to the variable usage specification ("VUS"). The Applicant respectfully disagrees. Specifically, the interface definition merely includes "syntactic units." In contrast, the claims require that the VUS includes "a usage specifying an *attribute of an object in the object graph.*" Simply put, the VUS, as recited in the claims, requires: (i) specifying an attribute; (ii) where the attribute is associated with an object; and (iii) the object is associated with an object graph. The mere recitation of "syntactic units" within the interface definition fails to specify an *attribute* of an object associated with an object graph. Rather, the syntactic unit specifies an entire object to be generated without specifying attributes of the object.

Moreover, even assuming *arguendo* that the interface definition can be construed to be equivalent to the VUS, the interface definition is directed to the *creation* of an object graph, while the VUS specifies attributes of an object, where (i) the object is *part* of the object graph and (ii) wherein the object graph has been *previously* created. In other words, Acker is directed to the creation of an object graph, while the invention recited in amended independent claim 1 is

directed to *trimming* an already existing object graph using the VUS. Acker is completely silent with respect to trimming a *preexisting* object graph.

In view of the above, Acker does not teach or suggest every aspect of amended independent claim 1. Accordingly, amended independent claim 1 is patentable over Acker. Amended independent claims 15, 17, 18, and 21-24 include essentially the same patentable limitations as amended independent claim 1, and, thus, are also patentable over Acker. Dependent claims are allowable for at least the same reasons. Withdrawal of this rejection is respectfully requested.

Rejection under 35 U.S.C. §103

Claim 9 stands rejected under 35 U.S.C. § 103(a) as obvious over Acker in view of AAPA. To the extent that this rejection applies to the amended claims, the rejection is respectfully traversed.

As discussed above, Acker fails to teach or suggest all the limitations of amended independent claim 1. Further, AAPA does not teach that which Acker lacks. This is evidenced by the fact that AAPA is only relied upon to teach "converting the object graph into a byte stream" (*See* Office Action mailed November 10, 2005 at p. 5). Accordingly, amended independent claim 1 is patentable over Acker and AAPA. Dependent claim 9 is patentable for at least the same reasons. Withdrawal of this rejection is respectfully requested.

Claims 10 and 11 stand rejected under 35 U.S.C. § 103(a) as obvious over Acker in view of U.S. Patent No. 6,405,386 ("Freyburger"). To the extent that this rejection applies to the amended claims, the rejection is respectfully traversed.

As discussed above, Acker fails to teach or suggest all the limitations of amended independent claim 1. Further, Freyburger does not teach that which Acker lacks. This is

evidenced by the fact that Freyburger is only relied upon to teach "conversion of a graph into a hash table" (*See* Office Action mailed November 10, 2005 at p. 6). Accordingly, amended independent claim 1 is patentable over Acker and Freyburger. Dependent claims 10 and 11 are patentable for at least the same reasons. Withdrawal of this rejection is respectfully requested.

Claim 13 stands rejected under 35 U.S.C. § 103(a) as obvious over Acker in view of U.S. Patent No. 6,092,120 ("Swaminathan"). To the extent that this rejection applies to the amended claims, the rejection is respectfully traversed.

As discussed above, Acker fails to teach or suggest all the limitations of amended independent claim 1. Further, Swaminathan does not teach that which Acker lacks. This is evidenced by the fact that Swaminathan is only relied upon to teach "compression of the object graph" (*See* Office Action mailed November 10, 2005 at pp. 6-7). Accordingly, amended independent claim 1 is patentable over Acker and Swaminathan. Dependent claim 13 is patentable for at least the same reasons. Withdrawal of this rejection is respectfully requested.

Claim 14 stands rejected under 35 U.S.C. § 103(a) as obvious over Acker in view of U.S. Patent No. 5,854,841 ("Nakata"). To the extent that this rejection applies to the amended claims, the rejection is respectfully traversed.
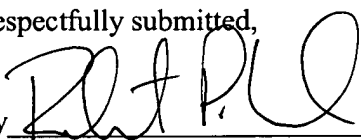
As discussed above, Acker fails to teach or suggest all the limitations of amended independent claim 1. Further, Nakata does not teach that which Acker lacks. This is evidenced by the fact that Nakata is only relied upon to teach "encrypting data before transmission between a server and a client" (*See* Office Action mailed November 10, 2005 at p. 7). Accordingly, amended independent claim 1 is patentable over Drewry and Nakata. Dependent claim 14 is patentable for at least the same reasons. Withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 16159/019001; P6414).

Dated: February 9, 2006   Respectfully submitted,

                                          By _____
                                          Robert P. Lord
                                          Registration No.: 46,479
                                          OSHA · LIANG LLP
                                          1221 McKinney St., Suite 2800
                                          Houston, Texas 77010
                                          (713) 228-8600
                                          (713) 228-8778 (Fax)
                                          Attorney for Applicant